

From: [Casey, Carolyn](#)
To: [Craig Ziady](#)
Cc: [Wainberg, Daniel](#); [Zucker, Audrey](#); [Bruce Hoskins](#); [Gregory Flaherty](#)
Subject: RE: Former USM facility, Beverly, MA
Date: Monday, January 22, 2018 8:22:00 AM

Craig and all, I did not receive a monthly progress report for January in accordance with the order (please refer to email below). If a hard copy was mailed, please email an electronic version.

Thank You,

Carolyn

Carolyn J. Casey

U.S. Environmental Protection Agency

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casey.carolyn@epa.gov

From: Zucker, Audrey
Sent: Friday, December 15, 2017 11:45 AM
To: Craig Ziady
Cc: Casey, Carolyn ; Wainberg, Daniel ; Murphy, Jim
Subject: FW: Former USM facility, Beverly, MA

Craig:

Please be reminded that under Paragraph 17.h. and 17.k. of the Administrative Order on Consent, Respondents are required to submit monthly progress reports, and to notify EPA with a proposed date for sampling:

- (1) at least 21 days in advance of any sampling activities;
- (2) thereafter, weekly up to the date of the sampling; and
- (3) when a sampling date is firm.

Monthly progress reports must include, among other things, a description of all activities related to the Work scheduled for the upcoming month. Your monthly progress reports are **due on the 13th of each month**.

In addition, please email me by close of business on Monday, Dec. 18 your proposed meeting date(s) with the four day care facilities, as discussed on our phone call on December 5th. In your email, please detail your interactions with each of the four day care facilities and confirm that they are available on the proposed date(s).

Thank you for your attention to these matters.

Audrey

From: Casey, Carolyn
Sent: Thursday, December 14, 2017 10:08 AM
To: Craig Ziady <craig@cummings.com>
Cc: Wainberg, Daniel <Wainberg.Daniel@epa.gov>; Bruce Hoskins <BHoskins@FslAssociates.com>; Gregory Flaherty <gxf@cummings.com>; Zucker, Audrey <Zucker.Audrey@epa.gov>; Murphy, Jim <Murphy.Jim@epa.gov>

Subject: RE: Former USM facility, Beverly, MA

Again, could I please get an update on field work. Did anything happen this week? Is anything planned for today or tomorrow? Please refer to the order about notification on field work. I have not been receiving updates or progress reports in accordance with the order. I was otherwise occupied this week and actually forgot about the sampling. A notification of the exact dates of any field work was required and would have been appreciated.

Could we also please get an update on contact with tenants at the facility. How did the conversations go? Any proposed meeting dates?

A couple of reminders for the indoor air sampling. Samples should be collected on a weekend where the doors can remain closed. The chain of custody (COC) for the 3/15 indoor air sampling event contains some discrepancies wrt the ending pressure on the canisters as compared to the canister and flow controller data from the lab. Pictures of the flow regulators should be provided along with detailed field logs for each sampling event. Units for vacuum should be provided in the COC. Also, the canisters should be collected at the end of the 8 hour sampling event (or 24 hour, consistent with the work plan). The COC indicates that these samples were collected for closer to 37 hours and the vacuum pressure reached 0 (assumed in. Hg). This data cannot be used in a quantitative risk assessment as the actual length of time that the air sample was collected is unknown. Also, the sample collection date is listed as 2014, not 2015. More attention should be paid to correctly and completely filling out the COC forms.

Thanks

Carolyn

From: Casey, Carolyn

Sent: Friday, November 17, 2017 8:18 AM

To: 'Craig Ziady' <craig@cummings.com>

Cc: Wainberg, Daniel <Wainberg.Daniel@epa.gov>; Bruce Hoskins <BHoskins@FslAssociates.com>; Gregory Flaherty <gxf@cummings.com>; Zucker, Audrey <Zucker.Audrey@epa.gov>

Subject: RE: Former USM facility, Beverly, MA

Could I please get a detailed schedule of the field work so I can observe when my schedule allows. As a reminder Section IX.17.k. of the order states the following:

Communications: Respondents and EPA will communicate frequently, cooperatively, and in good faith with each other to assure successful completion of the requirements of this Order. In addition, Respondents shall schedule a meeting with EPA at least once a month to discuss the Work proposed and performed under this Order.

Respondents shall notify EPA with a proposed date for sampling: (1) at least 21 days in advance of any sampling activities; (2) thereafter, weekly up to the date of sampling; and (3) when a sampling date is firm.

Regarding your request... "Could you please also let me know at your convenience when you might be available to meet briefly to discuss the ecological assessment with us and with the ecological contractor."

I am available all day next Monday 11/20, and Tues 11/21 and Wed before 10:00. The week of Nov 27th, I am available all day Mon and Wed, and Thurs except 11:30-12:30.

Thanks

Carolyn

Carolyn J. Casey

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From: Craig Ziady [<mailto:craig@cummings.com>]

Sent: Wednesday, November 08, 2017 5:19 PM

To: Casey, Carolyn <Casey.Carolyn@epa.gov>

Cc: Wainberg, Daniel <Wainberg.Daniel@epa.gov>; Bruce Hoskins <BHoskins@FslAssociates.com>; Gregory Flaherty <gxf@cummings.com>; Zucker, Audrey <Zucker.Audrey@epa.gov>

Subject: RE: Former USM facility, Beverly, MA

Hi Carolyn – Thanks for reaching out. I was out of town last week.

The GPR and drilling work is ongoing. Sampling is expected to commence thereafter, probably beginning in December given the timing of the final approval by EPA and the DigSafe/GPR/drilling work.

In response to your recent request for additional information relative to the location of the former North Shore Regional Vocational School machine shop, please see the enclosed excerpt from a May 19, 1989 AHERA Management Plan prepared by Hygeia, Inc. This report, which related to asbestos-containing material within the old USM building, contained detailed handwritten plans of the layout of the NSRVHS, including characterization of the floor sequence as “basement” through “third floor” (see attached plans). Please confirm that we may pursue the PCB sampling in the area shown as “Machine Tech” rooms shown on the “Third Floor Plan,” as proposed.

Could you please also let me know at your convenience when you might be available to meet briefly to discuss the ecological assessment with us and with the ecological contractor? We believe it would be advantageous for us all to have a brief meeting prior to submittal of the work plan and can make ourselves available for a conference call or meeting that works for your schedule.

Finally, in response to your request for two minor revisions to the QAPP, please see attached (revised) page 15, which incorporates your changes. This page may be substituted for the previously submitted page 15 of the QAPP.

Thanks very much.

As always, please let me know if you have any questions.

Craig J. Ziady

General Counsel

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From: Casey, Carolyn [<mailto:Casey.Carolyn@epa.gov>]

Sent: Wednesday, November 08, 2017 2:25 PM

To: Craig Ziady

Cc: Wainberg, Daniel; Bruce Hoskins; Gregory Flaherty; Zucker, Audrey

Subject: RE: Former USM facility, Beverly, MA

Could I please get an update on when work will start?

Thank You,

Carolyn

Carolyn J. Casey

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From: Casey, Carolyn

Sent: Wednesday, October 11, 2017 8:09 AM

To: 'Craig Ziady' <craig@cummings.com>

Cc: Wainberg, Daniel <Wainberg.Daniel@epa.gov>; 'Bruce Hoskins' <BHoskins@FslAssociates.com>;

'Gregory Flaherty' <gxf@cummings.com>; Zucker, Audrey <Zucker.Audrey@epa.gov>

Subject: RE: Former USM facility, Beverly, MA

As promised, pdf version attached.

From: Casey, Carolyn

Sent: Friday, October 06, 2017 2:21 PM

To: 'Craig Ziady' <craig@cummings.com>

Cc: Wainberg, Daniel <Wainberg.Daniel@epa.gov>; Bruce Hoskins <BHoskins@FslAssociates.com>;

Gregory Flaherty <gxf@cummings.com>; Zucker, Audrey <Zucker.Audrey@epa.gov>

Subject: RE: Former USM facility, Beverly, MA

Please see the attached files. I apologize for the unorthodox method of sending these documents but I have been waiting for IT to fix my scanner and I didn't want to wait any longer. I will send signed pdf documents ASAP. A hard copy to Craig will be in the mail next week.

Thanks

Carolyn

Carolyn J. Casey

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From: Craig Ziady [mailto:craig@cummings.com]

Sent: Thursday, October 05, 2017 5:15 PM

To: Casey, Carolyn <Casey.Carolyn@epa.gov>

Cc: Zucker, Audrey <Zucker.Audrey@epa.gov>; Wainberg, Daniel <Wainberg.Daniel@epa.gov>;

Bruce Hoskins <BHoskins@FslAssociates.com>; Gregory Flaherty <gxf@cummings.com>

Subject: RE: Former USM facility, Beverly, MA

Hi Carolyn – Both items are attached. Please return a fully executed Title and Approval page when it is completed.

Thank you.

Craig

Craig J. Ziady
General Counsel
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From: Casey, Carolyn [<mailto:Casey.Carolyn@epa.gov>]
Sent: Thursday, October 05, 2017 3:18 PM
To: Craig Ziady
Cc: Zucker, Audrey; Wainberg, Daniel; Bruce Hoskins; Gregory Flaherty
Subject: RE: Former USM facility, Beverly, MA

Just to clarify, I was looking for the original unmodified version of the figure for the vocational school. When should I expect this and the QAPP signature page?

From: Casey, Carolyn
Sent: Wednesday, October 04, 2017 4:35 PM
To: 'Craig Ziady' <craig@cummings.com>
Cc: Zucker, Audrey <Zucker.Audrey@epa.gov>; Wainberg, Daniel <Wainberg.Daniel@epa.gov>; Bruce Hoskins <BHoskins@FslAssociates.com>; Gregory Flaherty <gxf@cummings.com>
Subject: RE: Former USM facility, Beverly, MA

Thank you for the recent submittals. Could you please scan and email the figure for the Vo Tech school. It was not included in the SAP. Also, please sign the QAPP approval page and email that to me as well. I expect to send out an approval as soon as I get these.

Thanks

Carolyn

From: Craig Ziady [<mailto:craig@cummings.com>]
Sent: Friday, September 29, 2017 1:25 PM
To: Casey, Carolyn <Casey.Carolyn@epa.gov>
Cc: Zucker, Audrey <Zucker.Audrey@epa.gov>; Wainberg, Daniel <Wainberg.Daniel@epa.gov>; Bruce Hoskins <BHoskins@FslAssociates.com>; Gregory Flaherty <gxf@cummings.com>
Subject: RE: Former USM facility, Beverly, MA

Hi Carolyn – Further to our recent correspondence and as a supplement to our written responses, please find enclosed redlined versions of the QAPP, USM Written Proposal/SAP, and Elliott Landing SAP that reflect the changes made pursuant to EPA's comments. I will forward a link to the full QAPP (766 pages) under separate cover due to its file size.

Please let me know if you have any questions.

Thank you

Craig J. Ziady
General Counsel

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From: Casey, Carolyn [<mailto:Casey.Carolyn@epa.gov>]
Sent: Wednesday, September 27, 2017 4:23 PM
To: Craig Ziady; Bruce Hoskins; Gregory Flaherty
Cc: Zucker, Audrey; Wainberg, Daniel
Subject: RE: Former USM facility, Beverly, MA

The timeline for submittals is in the order. The comments were sent by email 9/5. The hard copy was received 9/11 so revised reports were due by 9/25. That being said, an extension until Friday would be acceptable.

From: Craig Ziady [<mailto:craig@cummings.com>]
Sent: Wednesday, September 27, 2017 11:05 AM
To: Casey, Carolyn <Casey.Carolyn@epa.gov>; Bruce Hoskins <BHoskins@FsIAssociates.com>; Gregory Flaherty <gxf@cummings.com>
Cc: Zucker, Audrey <Zucker.Audrey@epa.gov>; Wainberg, Daniel <Wainberg.Daniel@epa.gov>
Subject: RE: Former USM facility, Beverly, MA

Hi Carolyn – We were attempting to move this process along most efficiently by not resubmitting all of the reports and simply providing our responses, so they could be incorporated in the reports once EPA approved them. I'm sorry you viewed this as inadequate.

We will revise the documents per your request, but we are not going to be able to finalize them by close of business today. Given that no deadline existed for the comment responses in the first place, they are by no means late. We assume you will not object/disapprove if the documents are submitted by the end of the week.

Please confirm. We will begin working on them today.

With regard to the specific comment you reference, this is specifically addressed in the SOP. Given the number of plans/reports we are submitting, there will, of course, be cross-references to one another, which is what occurred here.

Thank you.

Craig

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From: Casey, Carolyn [<mailto:Casey.Carolyn@epa.gov>]

Sent: Wednesday, September 27, 2017 10:03 AM

To: Craig Ziady; Bruce Hoskins; Gregory Flaherty

Cc: Zucker, Audrey; Wainberg, Daniel

Subject: FW: Former USM facility, Beverly, MA

Craig, This response is inadequate. It's not possible to complete our review without actually seeing the revisions in context. The response to comments alone is insufficient. I will issue a formal disapproval by the end of the day if the comments have not all been appropriately addressed within the documents and resubmitted by COB today.

Again, a complete review could not be completed but I am passing the following comments along now regarding the Written proposal/SAP North Parcel

This response does not address the second part of the comment asking if more than one sample will be collect at each depth interval. The point being that multiple concrete samples need to be collected at each location for each depth interval in order to collect a sufficient volume to achieve required detection limits. Again, please re-visit the SOPs.

EPA Comment: In the second paragraph on page 24, the discussion of the SOP for concrete needs to be revisited. The 0-0.05 inch-depth interval does not make sense. Further, it is unclear if only 1 sample would be collected at each depth interval per sample location. If so, this would likely not be a sufficient volume for the laboratory to achieve required detection limits.

Response: *The text has been revised consistent with the STANDARD OPERATING PROCEDURE FOR SAMPLING POROUS SURFACES FOR POLYCHLORINATED BIPHENYLS (PCBs) in the QAPP. The 0-0.05 inch depth interval has been eliminated. Intervals to be collected will be 0-0.5 inches and 0.5-1.0 inches.*

Regarding the Elliot Landing SAP and the first comment in the response. This section should clarify what threshold criteria means as stated in the last response from Cummings (It should be clear threshold criteria is not referring to threshold values).

Carolyn J. Casey

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From: Craig Ziady [<mailto:craig@cummings.com>]

Sent: Friday, September 22, 2017 5:52 PM

To: Casey, Carolyn <Casey.Carolyn@epa.gov>

Cc: Bruce Hoskins <BHoskins@FslAssociates.com>; Gregory Flaherty <gxf@cummings.com>; Zucker, Audrey <Zucker.Audrey@epa.gov>

Subject: RE: Former USM facility, Beverly, MA

Hi Carolyn – Thank you for your most recent set of comments. Please see our responses attached. We have not included final amended documents, as it seems to make sense to finalize the comments first rather than proceed through the exercise of making serial minor revisions to the plans and documents at each stage. We will provide final revised documents promptly following resolution of these final comments.

As always, please let me know if you have any questions.

Thank you.

Best,

Craig

Craig J. Ziady

General Counsel

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From: Casey, Carolyn [<mailto:Casey.Carolyn@epa.gov>]

Sent: Tuesday, September 05, 2017 4:27 PM

To: Craig Ziady

Cc: Zucker, Audrey; Bruce Hoskins; Gregory Flaherty; Wainberg, Daniel; Knox, Rosemary (DEP); Miano, John (DEP)

Subject: RE: Former USM facility, Beverly, MA - redlined documents

Please see attached. A hard copy to follow to Craig only. If others would like one, please let me know.

Thanks

Carolyn

Carolyn J. Casey

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From: Craig Ziady [<mailto:craig@cummings.com>]

Sent: Friday, August 04, 2017 12:35 PM

To: Casey, Carolyn <Casey.Carolyn@epa.gov>

Cc: Zucker, Audrey <Zucker.Audrey@epa.gov>; Bruce Hoskins <BHoskins@FslAssociates.com>; Gregory Flaherty <gxf@cummings.com>

Subject: Former USM facility, Beverly, MA - redlined documents

Carolyn - Finally, as a supplement to the full reports sent under separate cover, here are the redline versions of the QAPP, USM Written Proposal, and Elliott Landing SAP.

We did not prepare separate redlines of the QMP or HASP due to the singular changes to those documents.

Please let me know if you have any questions.

Thank you.

Craig

Craig J. Ziady

General Counsel

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